Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services

STATEMENT OF BASIS

Holden Wood Products Mill
Weyerhaeuser Company
Holden, Livingston Parish, Louisiana
Agency Interest Number: 19875
Activity Number: PER20070002
Draft Permit 1740-00015-V2

I. APPLICANT:

Company:
Weyerhaeuser Company
P.O. Box 280, Holden, LA 770744-0280

Facility:
Holden Wood products Mill
17391 Florida Boulevard, Holden, Livingston Parish, Louisiana
Approximate UTM coordinates are 726.70 kilometers East and 3377.40 kilometers North, Zone 15

II. FACILITY AND CURRENT PERMIT STATUS:

Weyerhaeuser Company purchased an existing lumber production mill, the Holden Wood Products Mill, from Cavenham Forest Industries in April 1996. Holden Wood Products Mill was issued Permit No. 1740-00015-02 on December 10, 1993. The Holden Wood Products Mill currently operates under Permit No. 1740-00015-V0 and PSD-LA-692, both issued June 18, 2003.

III. PROPOSED PERMIT / PROJECT INFORMATION:

Proposed Permit

A permit application and Emission Inventory Questionnaire were submitted by Weyerhaeuser Company on November 30, 2007, requesting a Part 70 operating permit renewal. Additional information dated February 25, 2009, was also received.

With this modification, Holden Wood Products Mill proposes to:

- Renew its Part 70 permit; and
- Incorporate a form of dust suppression system for Fugitive Road Dust (FUG 1) generated from unpaved roads.

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Project description

The Holden Wood Products Mill produces dimensional lumber. Current operations can be divided into the following areas: log yard operation, rough cutting, lumber drying, lumber finishing, and shipping.

Logs delivered to the mill are placed on storage for later use or are loaded directly to the slasher. Logs delivered to the slasher are cut to specific lengths. From the slasher, logs are fed to the debarker. Bark from the debarker is hogged and loaded into trucks for transfer off-site.

Debarked logs are directed to either the small log processor, the whole log chipper, or the sawmill. Rough cut green limber may be shipped off-site or directed to the five existing kilns. The rough green lumber is sorted and stacked. Sawdust, short pieces of green lumber, , and wood chips from the rough cutting operations are screened. Large materials are loaded into collection bins for off-site transfer. Sawdust is transferred tot eh green fuel storage house for use as fuel.

Packs of rough cut lumber are loaded into one of the direct-fired lumber dry kilns where they are dried to the desired moisture level. After drying, the lumber is removed from the kilns. Dry lumber is either sent to lumber finishing or sold.

Dry Kilns No. 1 and No. 2 (EQT 3 and EQT 9, respectively)utilize dry wood-residue fuel in suspension burners which use propane as an igniter fuel. Dry Kilns No. 3, 4, and 5 (EQT 5, EQT 7, and EQT 2, respectively) utilize green wood-residue fuel in sloped grate burners.

Dried lumber is directed to the planer mills. At the planer mills, the packs of rough dry lumber are broken down and the kiln stacks removed. Each board is passed through a planer to smooth the surface and finish the board to its final length. The finished lumber is graded and packaged for shipping. Wood residuals from the finishing process are either pneumatically conveyed to cyclones which feed the truck bin loading process or are directed to a hammer mill prior to storage in the dry fuel storage silo.

Section 6 of the Permit Application, dated July 7, 2005, lists the permitted emission rate before and after the project (in tons per year) for each emission point in the permit. These changes are summarized in the Permitted Air Emissions Section.

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Permitted Air Emissions

Estimated changes in permitted emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM_{10}	87.76	87.34	- 0.42
SO_2	19.41	19.41	-
NO_X	50.34	50.34	-
CO	482.44	482.44	-
VOC *	391.82	391.82	-

Prevention of Significant Deterioration Applicability

The pollutants are not being increased by significant amounts by the project. Therefore, the proposed facility is not subject to the requirements of the PSD program.

This application was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations, Prevention of Significant Deterioration (PSD), and National Emission Standards for Hazardous Air Pollutants (NESHAP). New Source Performance Standards (NSPS) do not apply.

MACT requirements

Holden Wood Products Mill is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51. Formaldehyde (Class I) and methanol (Class III) are emitted in amounts that exceed the major source threshold. Acetaldehyde (Class II), chromium VI (and compounds) (Class I), formaldehyde (Class I), hydrochloric acid (Class III), manganese (and compounds) (Class II), methanol (Class III), nickel (and compounds) (Class I), and phenol (Class II) are above their respective minimum emission rates (MER). This facility must address MACT. MACT has been determined to be compliance with 40 CFR 63 Subpart DDDD – Plywood and Composite Wood Products.

The facility complies with the ambient air standards (AAS).

Air Modeling Analysis

No dispersion modeling was performed.

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General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to Section VIII of the draft Part 70 permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to Section IX of the draft Part 70 permit.

Regulatory Analysis

The applicability of the appropriate regulations is straightforward and provided in the Facility Specific Requirements Section of the draft permit, or where provided, Tables 2, 3 and 4 of the draft permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are provided in the Facility Specific Requirements Section of the draft permit, or where provided, Tables 2, 3 and 4 of the draft permit.

IV. Permit Shields

There is no permit shield.

V. Periodic Monitoring

Compliance Assurance Monitoring

Federal regulation 40 CFR 64-Compliance Assurance Monitoring is not applicable to this facility.

VI. Applicability and Exemptions of Selected Subject Items		
ID No:	Requirement	Notes
EQTs 2-9	Emission Standards for Sulfur Dioxide [LAC 33:III.1503]	EXEMPT. Units emit less than 5 tons of SO_2 per year. [LAC 33:III.1502.A.3]

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VI. Applicability and Exemptions of Selected Subject Items		
ID No:	Requirement	Notes
EQT 10	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. [40 CFR 60.110b]	DOES NOT APPLY. Storage tank capacity is less than 75 cubic meters. [40 CFR 60.110b(a)]

VII. Streamlined Requirements			
Unit or Plant Site	**Programs Being Streamlined**	**Stream Applicability**	**Overall Most Stringent Program**
Holden Wood Products Mill	None	-	-

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VIII. Glossary

Best Available Control Technologies (BACT) - An emissions limitation (including a visible emission standard) based on the maximum degree of reduction for each pollutant subject to regulation under this part which would be emitted from any proposed major stationary source or major modification which the administrative authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant.

Carbon Monoxide (CO) – A colorless, odorless gas which is an oxide of carbon.

Grandfathered Status- Those facilities that were under actual construction or operation as of June 19, 1969, the signature date of the original Clean Air Act. These facilities are not required to obtain a permit. Facilities that are subject to Part 70 (Title V) requirements lose grandfathered status and must apply for a permit.

Hydrogen Sulfide - A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the action of acids on metallic sulfides, and is an important chemical reagent.

Maximum Achievable Control Technology (MACT) - The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

New Source Review (NSR) - A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C ("Prevention of Significant Deterioration of Air Quality") and D ("Nonattainment New Source Review").

Nitrogen Oxides (NO_x) - Compounds whose molecules consists of nitrogen and oxygen.

Nonattainment New Source Review (NNSR) - A New Source Review permitting program for major sources in geographic areas that do not meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. Nonattainment NSR is designed to

ensure that emissions associated with new or modified sources will be regulated with the goal of improving ambient air quality.

Organic Compound - Any compound of carbon and another element. Examples: Methane (CH_4), Ethane (C_2H_6), Carbon Disulfide (CS_2)

Part 70 Operating Permit- Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: $\geq$ 10 tons per year of any toxic air pollutant; $\geq$ 25 tons of total toxic air pollutants; and $\geq$ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM_{10}- Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) - The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO_2) – An oxide of sulphur.

Title V permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) - Any organic compound which participates in atmospheric photochemical reactions; that is, any organic compound other than those which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.